

Fact Sheet



For Draft/Proposed Renewal Permitting Action Under 45CSR30 and Title V of the Clean Air Act

Permit Number: R30-03300018-2011
Application Received: July 14, 2010
Plant Identification Number: 03-54-03300018
Permittee: Consolidation Coal Company
Facility Name: Robinson Run Preparation Plant
Mailing Address: Route 1, Box 26
Shinnston, WV 26431

Physical Location: Shinnston, Harrison County, West Virginia
UTM Coordinates: 554.82 km Easting • 4361.54 km Northing • Zone 17
Directions: From U.S. Route 19 in Shinnston, travel west on County Route 3 (Lucas Rd.) for approximately 2.7 miles until turning left on County Route 3/4. Proceed on Route 3/4 for approximately 0.9 miles to the plant site.

Facility Description

Consolidation Coal Company's Robinson Run facility operates an 1,800 tons per hour coal preparation plant. The facility has the potential to operate seven (7) days per week, twenty-four (24) hours per day and fifty-two (52) weeks per year. SIC Code: 1222

A minor modification (MM01) application was received on January 4, 2010 which covers changes included in recently revised Permit R13-2306D (issued on August 27, 2010). The changes from this minor modification have been incorporated in this renewal.

Consolidation Coal Company (Consol) proposes to add refuse conveyor C11C and refuse bin RB3; after-the-fact inclusion of refuse conveyors C11A and C11B and refuse bin RB2 constructed in 1981; and increase the hourly rate of the existing refuse system from 500 tons per hour (TPH) to 800 TPH. The use of the new refuse bin RB3 will result in an increased round trip distance for refuse trucking from the existing 0.5 miles to the proposed 2.2 miles, resulting in a fugitive emissions increase.

The facility also proposes to update the equipment list to show as-built revisions to the facility. The equipment list will be updated as follows: delete conveyor A0, which was constructed and then removed; delete previously permitted but not constructed conveyors C15, C22, C23, C7B, the reclaim feeder (056/057) for C7B and clean coal blending stockpile 054; and include existing equipment not currently in the permit (A3A - 1994; SC-3, CR1 and SC2 - 2002; and C7A - 2002).

Emissions Summary

Plantwide Emissions Summary [Tons per Year]		
Criteria Pollutants	Potential Emissions	2009 Actual Emissions
Particulate Matter (PM _{2.5})	33.80	13.28
Particulate Matter (PM ₁₀)	266.96	47.28
Total Particulate Matter (TSP)	721.70	95.68
Volatile Organic Compounds (VOC)	37.60	29.65

PM₁₀ is a component of TSP.

Title V Program Applicability Basis

This facility has the potential to emit 266.96 tons per year of PM₁₀. Due to this facility's potential to emit over 100 tons per year of criteria pollutant, Consolidation Coal Company is required to have an operating permit pursuant to Title V of the Federal Clean Air Act as amended and 45CSR30.

Legal and Factual Basis for Permit Conditions

The State and Federally-enforceable conditions of the Title V Operating Permits are based upon the requirements of the State of West Virginia Operating Permit Rule 45CSR30 for the purposes of Title V of the Federal Clean Air Act and the underlying applicable requirements in other state and federal rules.

This facility has been found to be subject to the following applicable rules:

Federal and State:	45CSR5	Control of particulate matter from coal preparation plants
	45CSR6	Open burning prohibited.
	45CSR11	Standby plans for emergency episodes.
	45CSR13	Permit for construction/modification
	WV Code § 22-5-4 (a) (14)	The Secretary can request any pertinent information such as annual emission inventory reporting.
State Only:	45CSR30	Operating permit requirement.
	40 C.F.R. Part 60, Subpart Y	Requirements for coal preparation plant
	40 C.F.R. Part 61	Asbestos inspection and removal
	40 C.F.R. Part 82, Subpart F	Ozone depleting substances
	45CSR4	No objectionable odors.
45CSR42	Greenhouse Gas Emissions Inventory Program	

Each State and Federally-enforceable condition of the draft Title V Operating Permit references the specific relevant requirements of 45CSR30 or the applicable requirement upon which it is based. Any condition of the draft Title V permit that is enforceable by the State but is not Federally-enforceable is identified in the draft Title V permit as such.

The Secretary's authority to require standards under 40 C.F.R. Part 60 (NSPS), 40 C.F.R. Part 61 (NESHAPs), and 40 C.F.R. Part 63 (NESHAPs MACT) is provided in West Virginia Code §§ 22-5-1 *et seq.*, 45CSR16, 45CSR34 and 45CSR30.

Active Permits/Consent Orders

Permit or Consent Order Number	Date of Issuance	Permit Determinations or Amendments That Affect the Permit (<i>if any</i>)
R13-2306D	8/27/2010	

Conditions from this facility's Rule 13 permit(s) governing construction-related specifications and timing requirements will not be included in the Title V Operating Permit but will remain independently enforceable under the applicable Rule 13 permit(s). All other conditions from this facility's Rule 13 permit(s) governing the source's operation and compliance have been incorporated into this Title V permit in accordance with the "General Requirement Comparison Table B," which may be downloaded from DAQ's website.

Determinations and Justifications

- **45CSR42 – Greenhouse Gas Emissions Inventory Program.**
 This facility is subject to 45CSR42. Refer to permit conditions 3.1.9 and 3.5.10. for the requirements pursuant to this rule. The language of the condition 3.5.10 is substantially that which is at 45CSR§42-4, with only revisions to referencing language and the word “Secretary” changed to “Director”.
- The Title V permit boilerplate has been revised such that a new Section 1.2 Table has been added which lists all the active R13, R14, and/or R19 permits and their date(s) of issuance. Also, the underlying authority for any conditions from the R13, R14, and/or R19 permits has been changed to cite the original permit number in the Title V permit. These changes will eliminate the need to go through the entire Title V permit to change the R13, R14, and/or R19 permit numbers each time an R13, R14, and/or R19 permit is modified. The only required change will be to the Section 1.2 Table.
- Region 3 has requested that all annual compliance certifications be submitted electronically (e-mail), so the permit templates have been updated in conditions 3.5.3. and 3.5.5.
- Previous permit conditions 3.1.9 through 3.1.15, 3.2.1, 3.2.2, 3.3.2, 3.4.4, 3.4.5 and 3.5.10 have been deleted because they are covered in section 5 of this permit.
- Condition 5.2.1 incorporates R13-2306D, 4.1.3 and 4.2.1, however this condition did not address haulroads. Haulroads are added to the list as being exempt along with the stockpiles because 40CFR 60 Subpart Y did not define haulroads as affected facilities and therefore, they are not subject to an opacity limit and visible emission readings.
- Previous permit condition 3.6.1 was regarding a compliance plan for emission units- A002, A004, A008, A006, A006A, 004, 026, 028, 032, 034. This condition has been removed because after R13- 2306 was issued on August 16, 1999, there was no need for this Compliance plan.
- Changes incorporated in this permit from R13-2306D are as follows:
 1. Source IDs- C11A, C11B, RB2, C11C, RB3, A3A, SC-3, SC2, CR1 and C7A have been added in the emission unit table.
 2. Conveyor A0 has been deleted which was constructed and then removed.
 3. Source IDs- 044, 045, [013, 015], 054, [056,058], C15, C22, C23 have been deleted from the emission unit table.

4. The maximum hourly throughout rate of the existing refuse system has been increased from 500 TPH to 800 TPH.
5. The round trip distance for refuse trucking has been increased from 0.5 miles to the proposed 2.2 miles.
6. Section 5 has been added to this permit to cover source specific requirements from R13-2306D.

Non-Applicability Determinations

The following requirements have been determined not to be applicable to the subject facility due to the following:

Prevention of Significant Deterioration and Title V Greenhouse Gas Tailoring Rule.

The facility has not made any changes that trigger a PSD modification; therefore, the requirements of the GHG tailoring rule are non-applicable.

40 CFR 64-Compliance Assurance Monitoring. This is the second permit renewal for this facility. The facility was found not to be applicable to CAM at the time of the first renewal. Therefore, a CAM determination is not required.

Request for Variances or Alternatives: None

Insignificant Activities

Insignificant emission unit(s) and activities are identified in the Title V application.

Comment Period

Beginning Date: January 19, 2011
Ending Date: February 18, 2011

All written comments should be addressed to the following individual and office:

Beena Modi
Title V Permit Writer
West Virginia Department of Environmental Protection
Division of Air Quality
601 57th Street SE
Charleston, WV 25304

Procedure for Requesting Public Hearing

During the public comment period, any interested person may submit written comments on the draft permit and may request a public hearing, if no public hearing has already been scheduled. A request for public hearing shall be in writing and shall state the nature of the issues proposed to be raised in the hearing. The Secretary shall grant such a request for a hearing if he/she concludes that a public hearing is appropriate. Any public hearing shall be held in the general area in which the facility is located.

Point of Contact

Beena Modi
West Virginia Department of Environmental Protection
Division of Air Quality
601 57th Street SE
Charleston, WV 25304
Phone: 304/926-0499 ext. 1228 • Fax: 304/926-0478

Response to Comments (Statement of Basis)

Not applicable.